

Civil Action No. 2:20-cv-5142

Specifically, Plaintiff seeks summary judgment on two elements of her “post-report” Title IX claim: (1) that Jane was sexually harassed at school by a sixth-grade classmate and (2) that District employees with authority to take corrective action had “actual notice” of the harassment. In addition, Plaintiff seeks summary judgment on one element of her “pre-assault” Title IX claim: that the District had “actual notice” that the classmate in question posed a substantial risk of

sexually harassing students before the District received reports that he had sexually assaulted Jane again in high school.

The grounds for Plaintiff's Motion are set forth in her accompanying Memorandum.

Date: March 31, 2022

Respectfully submitted,

s/ Laura E. Laughlin
Laura E. Laughlin (311896)
Messa & Associates, P.C.
123 S. 22nd Street
Philadelphia, PA 19103
Tel: (215) 568-3500
Fax: (215) 568-3501
llaughlin@messalaw.com

Adele P. Kimmel*
Alexandra Z. Brodsky*
Mollie L. Berkowitz†*
Public Justice, P.C.
1620 L Street NW
Suite 630
Washington, DC 20036
Tel: (202) 797-8600
Fax: (202) 232-7203
akimmel@publicjustice.net
abrodsky@publicjustice.net
mberkowitz@publicjustice.net

Counsel for Jane Doe

*Admitted *Pro Hac Vice*

† Application to the D.C. Bar pending;
Admitted to practice in New York.

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022, I filed the foregoing Plaintiff Jane Doe's Motion for Partial Summary Judgment, accompanying memorandum, and exhibits using the CM/ECF system, which will send electronic notice of this filing to Defendant's counsel of record.

s/ Laura E. Laughlin
Laura E. Laughlin (311896)
Messa & Associates, P.C.
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Philadelphia, PA 19103
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Fax: (215) 568-3501
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Counsel for Jane Doe